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October 7, 2015

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Revitalization of the AM Radio Service, MB Docket No. 13-249, Notice of *Ex Parte* Communication

Dear Ms. Dortch:

This reports on six meetings or calls held October 5th and 6th, 2015 between Commission staff and MMTC representatives David Honig, President Emeritus, Maurita Coley, Vice President and Chief Operating Officer, and Dorrissa D. Griffin, Esq., Chief of Staff and Staff Counsel to explore the issue of AM radio revitalization in the referenced docket:

- Monday, October 5, 2015 (teleconference with David Honig and Maurita Coley):
 - Chanelle Hardy, Chief of Staff and Media Legal Advisor to Commissioner Mignon Clyburn; and
- Tuesday, October 6, 2015 (in person meetings with David Honig and Dorrissa Griffin):
 - Valery Galasso, Policy Advisor to Commissioner Jessica Rosenworcel
 - Commissioner Ajit Pai; and Matthew Berry, Chief of Staff for Commissioner Ajit Pai
 - Maria Kirby, Legal Advisor of Media, Consumer and Governmental Affairs, and Enforcement to Chairman Wheeler
 - Commissioner Michael O’Rielly; and Robin Colwell, Chief of Staff and Senior Legal Advisor, Media to Commissioner Michael O’Rielly
 - Chanelle Hardy, Chief of Staff and Media Legal Advisor to Commissioner Mignon Clyburn

MMTC’s proposal for an AM-only window for AM stations to obtain FM translators has garnered widespread support and has met with no meaningful opposition since it was proposed two years ago. Fifty CEOs of minority owned broadcast companies wrote the Commission last month detailing its importance to their businesses and to paving the way for future minority station owners. The Congressional Black Caucus’s leadership echoed this sentiment as well. Former Commissioners Michael Copps and Robert McDowell authored a bipartisan op-ed detailing just how critical an exclusive window is for small and minority AM broadcasters. Notwithstanding our

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advocacy for an AM-only window instead of, or in addition to, the Chairman's proposed 250-mile waiver approach, we understand that the Commission is poised to move forward with the 250-mile waiver approach.

While we continue to believe that providing an exclusive window for AM stations to obtain FM translators is essential, we respect the fact that the FCC is going in a different direction. We encouraged each office to take the position that the Commission is not institutionally opposed to the idea of having an AM-only window at some point, and that the concept of an AM-only window is sound.

We also ask that the Commission monitor the 250-mile waiver approach to determine its impact on minority ownership, and monitor the impact of the waiver approach on broadcasters' access to capital.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Keenan', with a stylized, flowing script.

Kim M. Keenan
President and CEO

cc: Commissioner Ajit Pai
Commissioner Michael O'Rielly
Matthew Berry
Robin Colwell
Maria Kirby
Chanelle Hardy
Valery Galasso